

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

MICHAEL BROWN

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Criminal No. JFM-10-0344  
Civil No. JFM-16-2409

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**MEMORANDUM**

Michael Brown has filed this action under 28 U.S.C. §2255 on *Johnson* grounds. Brown's motion will be denied. *Johnson v. United States*, 135 S.Ct. 2551 (2015) invalidated the residual clause of the Armed Career Criminal Act definition for "violent felonies." Brown was deemed to be an armed career criminal not because of prior felony offenses but because he had at least three prior serious drug offenses.

A separate order denying Brown's motion is being entered herewith.

Date: August 29, 2016

/s/  
J. Frederick Motz  
United States District Judge